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DATE FILED: 9/7/2021

September 5, 2021

Hon. Analisa Torres

United States District Judge

Southern District of New York

500 Pearl Street

New York, N.Y. 10007

VIA ECF

Re: United States v. Spencer et al., No. 1:20-Cr-78 (AT)

Dear Judge Torres:

We represent Ashanne McLaughlin in the above-captioned case. We write this letter to respectfully request this Court to extend time to file motions. During the past several months circumstances have changed. The co-defendant in our trial grouping has plead guilty, and a co-defendant in one of our overt acts has been murdered. Furthermore, we are presently engaged in plea negotiations with AUSA Andrew Chan.

Wherefore, we respectfully request October 22, 2021, the same date as other counsel have requested for the filing defense pre-trial motions. Thank you for your consideration in this matter.

GRANTED. By October 22, 2021, Defendant shall submit any pretrial motions. By November 19, 2021, the Government shall submit any opposition. By December 3, 2021, Defendant shall file his reply, if any.

SO ORDERED.

Dated: September 7, 2021 New York, New York

> ANALISA TORRES United States District Judge